

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

ICE MILLER LLP

Louis. T. DeLucia, Esq.
Alyson M. Fiedler, Esq.
1500 Broadway
Suite 2900
New York, NY 10036
Phone: 212-835-6312
louis.delucia@icemiller.com
alyson.fiedler@icemiller.com

*Counsel to AIRN Liquidation Trust Co., LLC,
in its capacity as Liquidation Trustee of the
AIRN Liquidation Trust*

In re:

NATIONAL REALTY INVESTMENT
ADVISORS, LLC,

Debtor.

Chapter 11

Case No: 22-14539-JKS

Hearing Date: October 15, 2024
Objection Date: October 8, 2024

**APPLICATION FOR ORDER SHORTENING TIME ON
(A) MOTION TO SEAL AND (B) VERIFIED APPLICATION**

AIRN Liquidation Trust Co., LLC, in its capacity as Liquidation Trustee (the “Liquidation Trustee”) of the AIRN Liquidation Trust (the “Liquidation Trust”), by and through its undersigned counsel, requests that the time period for a hearing to be held on the (a) *Liquidation Trustee’s Motion to Seal Verified Application* (the “Motion to Seal”) and (b) *Liquidation Trustee’s Verified Application Seeking Bankruptcy Court Approval to Pay Certain Fees Related to Confidential Settlement* (the “Verified Application”), as required by D.N.J. LBR 9013-2, be shortened pursuant to Fed. R. Bankr. P. 9006(c)(1) for the reasons set forth below:

1. Contemporaneously herewith, the Liquidation Trustee filed its Motion to Seal seeking authorization to file the Verified Application under seal in accordance with the procedures under Local Rule 9018-1. The Verified Application seeks Bankruptcy Court authorization to pay certain fees related to a confidential settlement.

2. A shortened time hearing is requested so that the Motion to Seal and Verified Application may both be considered at the same time as the Liquidation Trustee's *Motion to File Terms of Settlements Included in Quarterly Reports Under Seal* [Dkt. No. 4009] (the "Quarterly Reports Motion"). The Verified Application is relevant to and bears upon the Quarterly Reports Motion and specifically certain informal objections raised by the Liquidation Trust Advisory Board with respect thereto. The hearing on the Quarterly Reports Motion was continued to allow time for the parties to resolve the Liquidation Trust Advisory Board's objections, but cannot be continued past October 15, 2024, without delaying the Liquidation Trust's obligation to file its quarterly report for the third quarter of this year.

3. The Liquidation Trustee respectfully requests that the Court enter the attached proposed order (the "Proposed Order"), scheduling a hearing on both the Motion to Seal and the Verified Application for **October 15, 2024, at 10:00 a.m.** and setting a response deadline of October 8, 2024.

4. The Liquidation Trustee will serve an unredacted copy of the Verified Application on counsel for the Liquidation Trust Advisory Board, who are authorized under the Liquidation Trust Agreement and other relevant documents to receive the confidential information discussed in the Verified Application. Accordingly, a shortened notice period will not prejudice any parties and is not prohibited under Rule 9006(c)(1) of the Federal Rules of Bankruptcy Procedure.

WHEREFORE, the Liquidation Trustee respectfully requests entry of the Proposed Order limiting notice for the Motion to Seal and Verified Application, and for such other and further relief as the Court may deem just and proper.

Dated: October 2, 2024

ICE MILLER LLP

/s/ Louis T. DeLucia

Louis T. DeLucia, Esq.

Alyson M. Fiedler, Esq.

1500 Broadway, Suite 2900

New York, NY 10036

Phone: (212) 835-6312

louis.delucia@icemiller.com

alyson.fiedler@icemiller.com

Michael W. Ott, Esq. (admitted *pro hac vice*)

200 W. Madison Street, Suite 3500

Chicago, IL 60606

Phone: (312) 726-7103

michael.ott@icemiller.com

*Counsel to the AIRN Liquidation Trust Co., LLC
in its capacity as Liquidation Trustee of the
AIRN Liquidation Trust*